IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

ELAINE RICHARDSON 484 Stone Shadow Drive

Blacklick, Ohio 43004

Case No. 2:17 U V 0 4 7 0

Plaintiff, : Judge Smith : Judge

v. MAGISTRATE JUDGE JOLSON

THE OHIO STATE UNIVERSITY

190 North Oval Mall Columbus, Ohio 43210,

Defendant.

COMPLAINT

Plaintiff Elaine Richardson ("Plaintiff") alleges the following:

- Plaintiff is currently employed as a full professor at The Ohio State University
 ("Defendant") in the College of Education and Human Ecology.
- 2. Defendant took actions against Plaintiff on the basis of her race, including acts of discrimination and harassment.
 - 3. As a direct and proximate result, Plaintiff has suffered monetary damages.

CLAIMS FOR RELIEF

Discrimination under Title VII of the Civil Rights Act of 1964

- 4. Plaintiff realleges and incorporates by reference the foregoing allegations.
- 5. Defendant's misconduct constituted discrimination under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq.

6. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered damages.

7. This court has jurisdiction of this matter pursuant to 28 U.S.C. § 1331.

Discrimination under Ohio Revised Code § 4112.02

- 8. Plaintiff realleges and incorporates by reference the foregoing allegations.
- 9. Defendant's misconduct constituted discrimination under Ohio Revised Code § 4112.02.
- 10. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered damages.
 - 11. This court has jurisdiction of this matter pursuant to 28 U.S.C. § 1367.

WHEREFORE, Plaintiff Elaine Richardson demands damages against the Defendant.

Respectfully submitted,

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